



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JD:JMH
F. #2015R01172

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 18, 2016

FedEx and ECF

Jeffery Greco, Esq.
Daniel DeMaria, Esq.
Richard Langweber, Esq.
535 Fifth Avenue, 25th Floor
New York, New York 10017

Re: United States v. Jacques Durand
Criminal Docket No. 15-531 (ILG)

Dear Sirs:

Enclosed please find supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The enclosed disc is encrypted and the password will follow by separate cover. The documents provided with this letter are provided subject to the protective order entered by the Court on February 24, 2016. See Docket Entry No. 22.

The documents Bates-numbered DURAND001113 through DURAND 001116 were obtained from ConsumerInfo.com, a credit monitoring service, and relate to services purchased using certain of the credit card accounts charged in the indictment.

The document Bates-numbered DURAND 001117 was obtained from Google, and relates to certain of the email addresses associated with the ConsumerInfo.com documents referenced above.

The document Bates-numbered DURAND 001118 was obtained from Equifax, a credit monitoring service.

The document Bates-numbered DURAND 001119 through DURAND 001127 was obtained from AOL, an internet service provider.

Future Discussions

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Please be advised that, pursuant to the policy of the Office concerning plea offers and negotiations, no plea offer is effective unless and until made in writing and signed by authorized representatives of the Office. In particular, any discussion regarding the pretrial disposition of a matter that is not reduced to writing and signed by authorized representatives of the Office cannot and does not constitute a “formal offer” or a “plea offer,” as those terms are used in Lafler v. Cooper, 132 S. Ct. 1376 (2012), and Missouri v. Frye, 132 S. Ct. 1399 (2012).

Very truly yours,

ROBERT L. CAPERS
United States Attorney

By: /s/ J. Matthew Haggans
J. Matthew Haggans
Assistant U.S. Attorney
(718) 254-6127

Enclosures

cc: Clerk of the Court (ILG) (by ECF) (without enclosures)